

Electronic Benefit Transfer (EBT) Project

Communication Plan

Version 2.1

November 30, 2001

EBT Project Communication Plan

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1 Communication Plan Revision History

The Communication Plan will be reviewed and updated every six months by the EBT Project Management.

Table 1: Revision History

REVISION	DATE OF RELEASE	PURPOSE
Initial Draft	12/8/00	Initial review.
Version 1	2/15/01	Includes revisions and corrections resulting from initial review.
Version 2	8/1/01	Semi-annual update.
Version 2.1	11/30/01	Stakeholder matrix updated

2 Introduction

The Health and Human Services Data Center (HHSDC) is committed to comprehensive and timely communication with project staff and stakeholders of the Electronic Benefit Transfer (EBT) Project. The EBT Project Communication Plan (the Plan) provides a framework for project informational exchange within and outside the project. The Plan focuses on formal communication elements.

In addition to the formal communication channels, other communication channels exist on informal levels and enhance those discussed within this Plan. This Plan is not intended to limit, but to enhance communication practices. Open, ongoing communication between stakeholders is important to the success of the EBT Project.

The following are objectives of the Communication Plan:

- To inform internal and external stakeholders:
 - Provide stakeholders with timely, factual and appropriate information about the system development and implementation process.
 - Communicate with stakeholders in ways that directly respond to their information needs.
 - Formalize a process that will allow the EBT Team to provide project information, strategy, and status updates to interested and affected parties, as the project evolves.
 - Communicate implementation schedules.
 - Document achievements as well as barriers.
 - Increase acceptance of the project through open, honest communication regarding the status of the project.
- To enlist the participation of stakeholders:
 - Clearly communicate the benefits and challenges that EBT will present and the stakeholders' roles in making it successful.
 - Acknowledge the importance of stakeholders' involvement in and contribution to a successful implementation.
 - Strengthen project partnerships.
- To prevent misdirected communication and to curb rumors:
 - Clarify the roles and responsibilities of various project partners in decision making, project activities, and communication.
 - Manage stakeholders' perceptions and expectations of the project requirements and outcomes.

- Reduce fear, uncertainty, and rumors through comprehensive, timely and accurate communication.
- To obtain feedback from stakeholders:
 - Develop a mechanism through which the counties and other external stakeholders can provide feedback, communicate concerns and discuss issues relating to the system development and implementation.
 - Provide a forum for and encourage two-way communication.
 - Evaluate, direct and escalate issues to appropriate arenas for resolution.

The following factors are critical to the success of project communication.

- **Awareness**

Communication about the project must occur. If stakeholders are not informed of the EBT Project mandates, objectives, constraints, and outcomes they will not be prepared for the changes; nor will they understand or support the changes they observe and experience.
- **Content**

Communication must be relevant, meaningful and at an appropriate level of detail for the target audience. The message should convey realistic expectations by dealing openly with the impact of change. Communication strategies should also be based on stakeholders' needs and feedback.
- **Timeliness**

Information must be shared in a timely manner to allow stakeholders opportunities to process project-related information and to react.
- **Communication Flow**

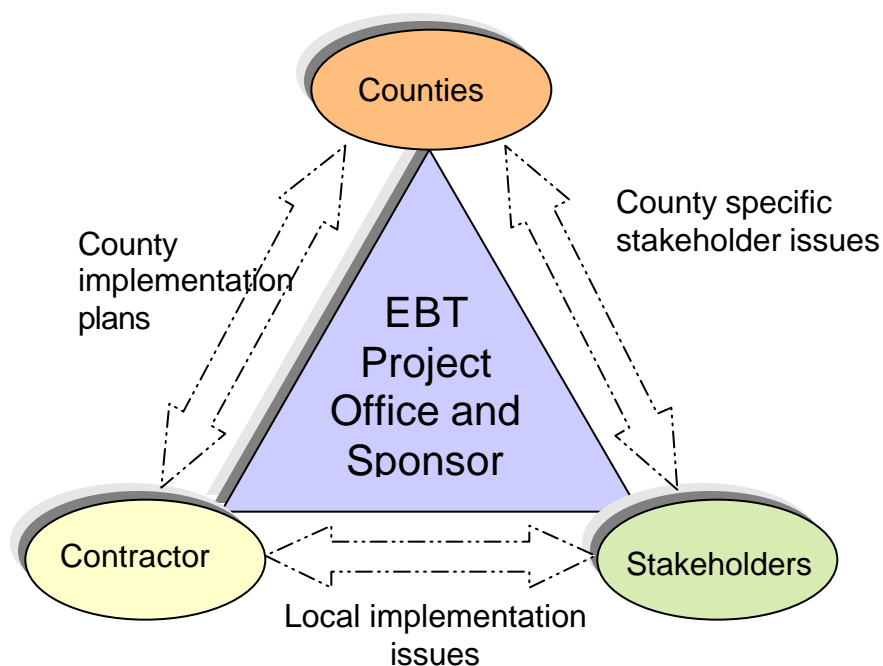
In order to curb misinformation and rumors, official project communication will flow through formal communication channels as described in this Plan.
- **Format and Media**

All communication must be developed and delivered in a format that is efficient, understandable, and easily accessible. As much as possible, existing communication vehicles should be used.

3 Project Organization

There are three essential groups that are directly involved in the EBT Project: the EBT Project Office, the Project Sponsor, Citicorp Electronic Financial Services (Citicorp EFS), and the counties. These four entities have primary roles and varying levels of responsibility for the success of the EBT Project. Communication among these groups is the foundation upon which the EBT system will be developed and implemented.

In addition to these entities, there are a variety of stakeholders with varying interests in the implementation of EBT. Stakeholders do not have any direct responsibility for project tasks, but their participation and support is essential in moving the project forward. The term “stakeholders” is used broadly to encompass various state and local agencies, as well as retailers and clients who will use the EBT system. The Project Office, Citicorp EFS and counties will each have varying roles and responsibilities for communication with relevant stakeholder groups, foremost of which are the retailers, clients, and advocacy groups representing clients’ interests.



3.1 Project Management and Project Sponsor

HHSDC is the state department with primary responsibility for overall project management, including

- Monitoring milestones, activities, timelines, resources, budgets and critical path;
- Implementation and operations;

- Contract monitoring and project management;
- Coordination and facilitation of statewide implementation in the counties.

CDSS Program Integrity Branch, as the Project Sponsor, is responsible for the success of the EBT Project and ensuring that EBT-related program policies are implemented. CDSS will approve EBT Project plans and documents as specified in the Project Charter. The EBT Project Director and the CDSS management will communicate on project status, issues and risks. CDSS is the point of contact for federal and state agencies and the State Legislature regarding EBT program policy issues.

Communication regarding project status and all program policies and decisions on issues with statewide impact is conducted at the project level. The general roles and responsibilities for communication are outlined in Table 2. The following table is not a comprehensive list of all project staff or communication responsibilities.

Table 2: EBT Project Office Communication Responsibilities

TEAM FUNCTION	GENERAL COMMUNICATION RESPONSIBILITIES
Project Director	<ul style="list-style-type: none"> • Communicates project status, issues and risks to internal and external stakeholders • Communicates with project staff regularly to direct project activities and track project status. • Communicates with CDSS Project Sponsor to report progress and status.
CDSS Project Sponsor	<ul style="list-style-type: none"> • Communicates project status, issues and risks to the CDSS executives, Food Stamps and CalWORKs managers, and CDSS IV&V. • Acts as executive contact for internal and external stakeholders. • Communicates food stamps and CalWORKs program policies that affect the EBT project. • Communicates with HHSDC Project Director regularly to monitor project activities and status.
Chief Administration Officer	<ul style="list-style-type: none"> • Communicates with HHSDC Budget Office, CDSS Project Sponsor and staff, and USDA Food and Nutrition Service (FNS) for fiscal management. • Communicates with HHSDC Human Resources for resource management. • Communicates regularly with other HHSDC units for completion of other project functions.
Contract Manager	<ul style="list-style-type: none"> • Communicates with HHSDC, CDSS, Department of General Services Procurement Division (DGS/PD), Department of Finance (DOF) and Department of Information Technology (DOIT) for contract preparation and approval. • Communicates with Project Director, CDSS, DGS/PD and Citicorp EFS to perform contract management and incorporate contract amendments required to keep contract current. • Communicates with Project Director, CDSS legal regarding any issues related to Citicorp EFS's compliance with contract requirements.

Implementation Manager	<ul style="list-style-type: none"> Communicates closely with the Citicorp EFS to review and approve implementation plans, schedules and deliverables. Oversees pilot operations and testing and participates in the pilot evaluation. Provides written and oral status reports to the Project Director and serves as liaison to the Project Director on statewide implementation issues and problems resolution. Prepares and Provides implementation status information for release to statewide stakeholders.
Regional Implementation Teams	<ul style="list-style-type: none"> Communicates closely with the Citicorp EFS and county project representative to plan, prepare and coordinate project implementation activities at the county level. Provides written and oral status reports to the state's Implementation Manager. Communicates regularly with the state's Implementation Manager regarding statewide implementation schedules, activities, and issues. Reports on issues and problems that may pose risks to the project.
Systems Engineering and Operations Manager	<ul style="list-style-type: none"> Communicates with the EBT Project Director and EBT team to keep them informed about issues, quality assurance, system testing, system change requests, problem reporting and EBT requirements and definition discussed in the course of communication with other parties. Communicates regularly with Citicorp EFS technical staff. Communicates with stakeholders to facilitate system design and development. Communicates with county and consortia eligibility system vendors that will interface with EBT as part of the system interface management. Communicates with Citicorp EFS, system users and clients as needed for system testing. Communicates with FNS's technical consultants.
CDSS Independent Verification and Validation (IV&V)	<ul style="list-style-type: none"> Communicates with the EBT Project Office as needed to perform IV&V evaluations. Communicates findings to Project Office, CDSS and DOIT.
Retailer Liaison	<ul style="list-style-type: none"> Acts as the state's primary liaison to retailers, financial institutions, commercial network providers and ATM owners. Communicates with state and Citicorp EFS implementation teams to ensure that rollout of retailer and financial institution implementation is coordinated and timely. Communicates project status and issues with the Retail Organizations Advisory Group. Communicates with non-traditional retailers about EBT status and implementation plans. Communicates with FNS's Regional Office regarding retail participation and equipment installation.
Program Liaison	<ul style="list-style-type: none"> Acts as the state's primary liaison to program departments at the state and county levels. Communicates with Citicorp EFS and participating stakeholders in system design and development phases to ensure that the system will meet program requirements. Communicates with CDSS Fraud Bureau to ensure the EBT system is meeting the state's investigative needs. Communicates with the counties regarding EBT issues and problems that are related to program policy rather than technical performance.

3.2 Prime Contractor

The prime contractor for the EBT Project (Citicorp EFS) is responsible for design, development, implementation and operation of the EBT system statewide. Citicorp EFS is responsible for carrying out the requirements of the EBT Contract, which includes the Invitation to Partner, the negotiated terms and conditions, and other documents specified therein. Citicorp EFS will communicate on project progress and status with the EBT Project Office. Face-to-face communication will occur with county and consortium staff as part of workgroups, and as Citicorp EFS begins implementation activities in the counties. Citicorp EFS will communicate with stakeholders as specific implementation issues may arise with individual stakeholders, or with groups of stakeholders at the request of the EBT Project Office.

The following table is not a comprehensive list of all Contractor team members or communication responsibilities, but at a high level describes Citicorp EFS's primary responsibilities.

Table 3: Prime Contractor Communication Responsibilities

TEAM FUNCTION	GENERAL COMMUNICATION RESPONSIBILITIES
Project Manager	<ul style="list-style-type: none"> Provides regular written and oral status reports to the State's Project Director as required by the contract, and reports on project progress versus the approved work plan. Communicates project risks, issues and proposed changes to the state's Project Director through formal risk management, issue management, and change control mechanisms. Communicates regularly with key staff at Citicorp EFS's headquarters, at the Sacramento Project Office, and in the field in California to maintain an overall understanding of project progress, issues and risks. Responsible for all Contractor project communication in the form of documents, correspondence, and deliverables.
Technical Project Manager	<ul style="list-style-type: none"> Communicate with state project staff, and county and consortium representatives regarding system design, interfaces, testing, development and operations. Leads Joint Application Design (JAD) sessions with state, county and consortium representatives for the purposes of requirements definition and system interface design. Communicates with the EBT Project Office regarding system performance, capacity, testing, and change orders. Communicates regularly with Citicorp EFS technical staff (Operations Manager, Telecommunications Manager, Test Manager, etc), to maintain an overall understanding of project technical progress, issues and risks.

System Implementation Manager	<ul style="list-style-type: none"> Communicates regularly with the state's Implementation Manager regarding statewide implementation schedules, activities, issues and risks. Provides input to written and oral status reports as required by the contract. Reports on project progress versus the approved Project Work Plan. Communicates regularly with Citicorp EFS's Regional Implementation Managers and other field staff to maintain an overall understanding of project progress, issues and risks related to implementation.
Regional Implementation Manager	<ul style="list-style-type: none"> Communicates closely with state and county project representative to plan, prepare and coordinate project implementation activities at the county level. Provides written and oral status reports to the System Implementation Manager and the state's Implementation Manager. Reports on project progress versus the approved county implementation work plans for each county in the region. Reports on issues and problems that may pose risks to the project.
Retailer Manager	<ul style="list-style-type: none"> Communicates with all California retailers (FNS authorized and others) to ensure that all eligible parties are provided the opportunity to participate in EBT. Prepares and executes a retailer communication and marketing plan to inform retailers about the EBT project. Communicates with other Citicorp EFS staff in order to coordinate and oversee the timely installation of equipment and training of retailers for EBT implementation. Communicates with the Citicorp EFS Customer Service Manager to review retailer issues and identify resolution strategies. Communicates with non-traditional retailer groups to inform them about EBT.
Cash Access Manager	<ul style="list-style-type: none"> Communicates with the EBT Project Office and the county welfare department about the specific cash access needs in a county. Develops and presents county-specific cash access plans for counties using cash EBT. Communicates with project management about cash access issues and risks. Develops and executes a community outreach and marketing plan to solicit the participation of cash access service providers. Communicates with ATM networks, ATM owners, and other potential cash access avenues to solicit their participation in EBT.

3.3 County Welfare Departments

EBT will be implemented in each county welfare department (the county). The county, along with its eligibility system vendor or consortium, is responsible for ensuring that the county is prepared to interface to the EBT system, and to convert during the implementation period.

The county will communicate directly with Citicorp EFS related to county-specific implementation plans and status; however, it is the responsibility of the EBT Project Office to direct the work of Citicorp EFS and monitor Citicorp EFS's performance. Communication about such issues will be directed through the EBT Project Office.

The county will be responsible for identifying local stakeholders and issues and addressing them at the county level. The EBT Project Office and the county will maintain an open dialog regarding issue management and stakeholder communication.

Table 4 depicts a limited number of county functions. Depending on each county's size and organizational needs, some of the communication responsibilities may be assigned to other individuals or teams, as the county project manager deems appropriate.

Table 4: County Welfare Department Communication Responsibilities

TEAM FUNCTION	GENERAL COMMUNICATION RESPONSIBILITIES
Welfare Director or designee	<ul style="list-style-type: none"> Communicates project information learned through the County Welfare Directors Association (CWDA) and other executive channels to county staff and stakeholders as appropriate. Communicates with CWDA regarding county EBT issues that may have statewide impact. Communicates with executives of other related county agencies, such as the Treasurer and Auditor/Controller about EBT status, plans and issues. Communicates with county Board of Supervisors as needed for project status updates and approvals.
EBT Coordinator	<ul style="list-style-type: none"> Primary point of contact between the county and the EBT Project Office during the county readiness phase until the county appoints a county project manager. During the readiness phase, briefs county executives on EBT status, issues and risks pertaining to the county. Identifies and communicates with local EBT stakeholders, including county staff, client advocates, and other interested parties about the status of county readiness activities. Identifies and establishes readiness planning teams necessary to prepare the county for implementation. Communicates regularly with the readiness planning teams about readiness planning activities, issues, and recommendations.

TEAM FUNCTION	GENERAL COMMUNICATION RESPONSIBILITIES
County Project Manager and Assistant Project Manager	<ul style="list-style-type: none">• Primary point of contact between the county and the EBT Project Office.• Provides EBT Project Office with regular updates to project related staff contact information (e.g. name, phone, email, address), and provides feedback about project communication (e.g., are messages reaching the intended audiences).• Briefs county executives on EBT status, issues, and risks pertaining to the county.• Identifies and communicates with local EBT stakeholders, including county staff, client advocates, and other interested parties about the status of county-specific EBT activities.• Identifies and establishes working teams necessary to prepare the county for implementation and to implement the county.• Identifies and addresses technical issues to ensure the county's eligibility system is capable of interfacing with the EBT system.• Communicates with Statewide Automated Welfare System (SAWS) consortia or eligibility system vendor.• Communicates regularly with the EBT Project implementation team about project activities and issues, including readiness planning, county decisions, equipment installation, etc.• Communicates with Citicorp EFS during Planning and Installation, and Implementation Phases.

4 Stakeholders

The first critical step in developing and delivering effective project communication is identifying, classifying and understanding the various stakeholders, their specific information needs, and their ability to influence and affect outcomes.

Numerous EBT project stakeholders have been identified. Some of these groups will periodically need to be kept informed of key milestones, findings and decisions that may indirectly impact their relationship to the EBT Project. However, other stakeholders require very detailed and frequent communication, as their organizations or job functions may be directly affected by EBT implementation.

The primary communication requirement for all stakeholders is to keep the EBT Project Office informed of issues and concerns that may impact the project scope, schedule or cost. The following identifies the key EBT stakeholders and current communication requirements.

4.1 California Department of Social Services

In addition to the role that CDSS Program Integrity Branch plays as Project Sponsor (see Section 3.1), there are many other branches and bureaus at CDSS that have a direct or indirect stake in EBT, including the CalWORKs Eligibility Bureau, Financial Planning Branch, Fiscal Systems and Accounting Branch, Food Stamp Bureau, Fraud Bureau, and State Hearings Division. The CDSS Project Sponsor will communicate regularly with CDSS stakeholders to provide information and regulations in areas such as fiscal, financial settlement and reconciliation, fraud activities, fair hearings, and program regulations. CDSS program staff (Food Stamp Program and CalWORKs) will review EBT processes to ensure conformity with program policy. Policy and regulation development requires regular communication within CDSS, and between CDSS and the county welfare offices and other agencies.

A monthly EBT Project Status Meeting will be held to inform all CDSS stakeholders of project status, upcoming project activities, and any other information that may be relevant to their functions.

The Project Sponsor in conjunction with EBT Project Office will hold as needed briefings to ensure CDSS's executive management is apprised of EBT status, issues and risks.

4.2 Control Agencies

Control Agencies are responsible for approving project approval documents and budgets. The EBT Project Office will communicate with control agencies as needed to obtain required approvals for the EBT project. The following are the control agencies identified for the EBT Project.

- **Department of Information Technology**

DOIT is responsible for all major information technology projects for the State of California, and will review and approve EBT Project documents such as the Advance Planning Documents (APDs), and procurement documents (ITP and contract).

- **Department of Finance**

DOF is responsible for approving the annual funding for the project and will approve the Budget Change Proposals (BCPs) and the Planning and Implementation Advance Planning Documents (PAPD and IAPD).

- **Department of General Services, Procurement Division**

DGS is responsible for conducting major information technology procurements for the State of California. DGS reviews and approves project documents pertaining to the procurement of the EBT contractor. DGS is the single point of contact for questions from bidders and potential bidders. DGS will assist in the facilitation of contact negotiations and will be a signor of the final EBT contract and any subsequent amendments.

- **United States Department of Agriculture, Food and Nutrition Service**

FNS is the federal agency responsible for administering the federal Food Stamp Program. FNS regulations govern the implementation of EBT systems for the delivery of food stamp benefits. FNS must approve some project documents (e.g., APDs, ITP, contract, retailer agreements) and some project milestones (e.g., System Acceptance Test).

4.3 EBT Executive Advisory Committee (EBT Committee)

The Welfare and Institution Code Section 10069 establishes an EBT Executive Advisory Committee (EBT Committee) to advise HHSDC “on the development and implementation of a statewide electronic benefits [sic] transfer system.” This executive-level group provides policy direction and advice to the EBT Project on the development and implementation of the statewide EBT Project. It may make recommendations for strategy changes and significant and critical project issues. Members help to ensure the success of the EBT Project strategy by sharing project information with the stakeholder groups they represent.

The EBT Committee is comprised of representatives of the various stakeholder groups noted above as well as additional state and county representatives. The legislation requires the EBT Committee to “provide for the participation of a technical advisory group” comprised of specific stakeholders. The technical advisory group participates as part of the EBT Committee, rather than a separate committee, and provides expert advice and stakeholder perspective to assist the EBT Project in fulfilling the vision of statewide EBT.

The EBT Committee will serve as the venue for Citicorp EFS to provide its required monthly project status update, as required by the contract.

The EBT Committee is comprised of the following representatives or their designees:

- Director of the Health and Human Services Data Center
- Director of the Department of Information Technology
- Director of the Department of Social Services
- Director of the Department of Health Services (DHS)
- Department of the Department of Finance
- The State Controller
- The State Treasurer
- A representative of the California State Association of Counties
- One member appointed by the Speaker of the Assembly
- One member appointed by the Senate Committee on Rules
- A representative of the County Welfare Directors Association
- A representative of the California Association of County Treasurers and Tax Collectors
- A representative of the California Grocers Association
- A representative of the California Bankers Association
- An advocate for clients who will use the EBT system

4.4 Department of Health, WIC Branch

The current project scope does not include the Women, Infants and Children (WIC) program; however, DHS's WIC Branch is legislatively mandated to study the feasibility of using an EBT system to deliver WIC benefits in the future. DHS WIC Branch is a member of the EBT Committee, which meets monthly, and receives regular project updates through that committee. The EBT Project Office will also participate with WIC in its feasibility study efforts upon request.

WIC is also an EBT stakeholder due to the WIC Farmers' Market Nutrition Program. As Food Stamp EBT will have a significant impact on some farmers' markets, it is important for the EBT Project Office to communicate closely with the WIC program regarding project status and possible farmers' markets solutions.

4.5 Counties

In addition to the county welfare departments that are directly involved with the planning and implementation of EBT throughout the state, there are other county-level stakeholders with varying levels of interest and involvement in the EBT Project.

4.5.1 County Welfare Directors Association

The County Welfare Directors Association (CWDA) represents county welfare directors and their designees. CWDA meets regularly to discuss program policy and welfare automation. The CWDA is also a lobbying group. County welfare directors' support for EBT is essential because it promotes collaboration between the State and counties to successfully accomplish development, conversion, and system implementation.

The EBT Project Director and Implementation Manager will communicate regularly with CWDA's Information Technology (IT) Liaison to keep CWDA informed of project status, schedule and issues. The EBT Project Office will provide monthly input to the CWDA IT newsletter.

A CWDA IT EBT Project Advisory Group was established to provide the EBT Project Office with a single point of contact that will be recognized by CWDA as such. The Advisory Group will allow the EBT Project Team, CDSS, and CWDA to have interactive discussions about EBT issues that directly impact counties, with the goal of ensuring that county input is received and county concerns are addressed. In addition, the Project Director will brief the county welfare directors at their regular meetings upon request to keep them informed of major project decisions, and system design and implementation issues.

CWDA will also participate as a member of the EBT Committee, which meets monthly.

4.5.2 County Treasurers and Auditors

If a county chooses to use the EBT system to deliver cash welfare benefits (CalWORKs or General Assistance), movement of benefit funds will involve the county's financial officers, such as the treasurer and auditor/controller.

The treasurer will be impacted in the area of cash management, fiscal agent contracts, and daily funds movement for settlement with Citicorp EFS. County auditors are concerned with EBT reconciliation and accountability. Auditors may be responsible for granting spending authority to the treasurer to move funds for EBT settlement.

The EBT Project Office has worked periodically with a financial settlement work group to understand business requirements, reporting needs, and interface issues that may affect the county treasurers and auditors.

A representative of the California Association of County Treasurers and Tax Collectors is a member of the EBT Committee, which meets monthly.

4.5.3 SAWS Projects, Eligibility System Vendors and Consortia

The EBT system will interface with existing SAWS and legacy eligibility systems, and with planned future SAWS implementations. Each of the individual systems, whether run by an individual county or a SAWS consortium, must interface with Citicorp EFS's system. County information systems departments or outside vendors will be responsible

for coding changes to accomplish data transfer between the eligibility system and the EBT system.

The EBT Project Office will communicate with representatives of the SAWS consortia by providing verbal and written status reports at the semi-monthly SAWS Consortia Strategy Committee Meetings and by participating in consortium planning meetings to address the scheduling and funding aspects of the EBT Project.

The EBT Project Office will also communicate through a work group, charged with refining standard interface specifications, validating current interface specifications, and preparing counties for Joint Application Design (JAD) sessions. After contract award, a work group will participate in JAD sessions with Citicorp EFS for general system design.

Final interface requirements will be communicated through the Interface Specifications Document delivered by Citicorp EFS, which will guide the county/consortium development of the eligibility system interface.

4.6 Retail Organizations

The success of the EBT Project is dependent upon the ability to piggyback on the commercial electronic funds transfer systems used by grocers and other retailers in the state, and the willingness of those merchants to provide services to EBT clients.

Discussion of retailer issues with statewide impact will be coordinated at the EBT Project Office level. Citicorp EFS will work closely with individual retailers, retail chain stores, and third party processors to ensure that all FNS-authorized merchants are able to participate in the EBT system for food stamps and cash benefits. Counties may also have reason to communicate with local retailers regarding the EBT participation, implementation plans, and problem resolution.

The state has established a Retail Organizations Advisory Group to ensure that the needs of retailers are considered and accommodated as much as possible in the EBT system. Responsibilities of the Advisory Group include increasing the awareness of grocers and other retailers of EBT and garnering their support of the EBT project; and identifying and addressing emerging EBT issues for consideration during statewide expansion of the EBT system.

The Retail Organizations Advisory Group will include representatives from the following associations and others that may be identified as the project advances.

- California Grocers Association
- California Association of Neighborhood Grocers
- California Retailers Association
- Northern California Grocers Association
- Korean-American Grocers Association of Northern California

- Korean-American Grocers Association of California
- Mexican-American Grocers Association

4.7 Financial Institutions and Networks

Similar to the role that retailers play for food stamp EBT, financial institutions and networks are critical to the viability of cash EBT. The California Bankers Association, STAR System network, and various financial institutions are key stakeholders for the success of the EBT Project. Much of the interaction with these organizations will be the responsibility of Citicorp EFS in developing and deploying a cash access network. However, the State has a key role in communicating with financial institutions to solicit their participation in providing low-cost or free banking services and access to automated teller machines (ATM).

4.8 Clients, Client Advocates and Community Based Organizations

Recipients of federal Food Stamp Program benefits, CalWORKs, and/or county general assistance/general relief are the ultimate stakeholders in the EBT system. They are the ones that will use the system daily to access their cash and food benefits. Working to ensure that recipients' interests are considered and addressed in the planning and implementation of EBT are a variety of client advocacy and community-based organizations.

The EBT Project Team has worked closely with a Client Advocate Advisory Group throughout the process of developing the project requirements, and will continue to hold meetings regularly with these interested parties through a Client Advocate Forum. The involvement of advocacy groups is an avenue by which the state and counties can be aware of clients' issues and concerns related to EBT, and by which the state can educate and inform advocates about state-level project requirements and timelines so they may keep their local communities informed.

Communication with local advocates on county-specific issues is the responsibility of each individual county welfare department. There are a variety of EBT decisions that are left to the individual county. Each county will determine its policies and methods for communicating with local groups regarding outreach, information sharing, discussions, and decision making pertaining to county-specific EBT issues.

5 Types of Communication

The communication types and the information contained within them are included here for instructional and informational purposes only and are not by inclusion in these tables necessarily public records as defined by the Public Records Act, Government Code §§6250 et seq. Prior to any information included within the communication types listed being released, a determination must be made as to whether it is subject to disclosure under the applicable provisions of the Public Records Act.

5.1 Message Types

Message types are the types of communications that have been identified as necessary for the successful development and implementation of the EBT system. The message types that have been identified to date are included in the following table.

Table 5: Message Types

MESSAGE TYPE	DESCRIPTION
Calendars / Schedules	The EBT Project Office will publish a project calendar with a schedule of the high-level project phases, milestones, and upcoming events. The Implementation Team will inform stakeholders of the specific schedules relevant to them. These schedules include JAD sessions, interface development, training, conversion, and so forth.
County Specific Issues	The Implementation Team will communicate to counties specifically for the resolution of county-specific issues. These issues will include application, data conversion, change leadership and training issues, as well as project status and scheduling as it relates to each county.
Feedback Requests	Surveys, questionnaires, interviews and focus groups will be used when necessary to solicit information from EBT stakeholders.
Frequently Asked Questions	The EBT Project Office will publish the answers to frequently asked questions via the project's Internet website
General Project Information	The EBT Project Office will make general project information readily available to all stakeholders. General information includes project scope and charter, and project work products such as the ITP requirements. This will be published via the Internet website.
General Updates	General updates regarding the project status, policies and other information will be distributed to stakeholders as necessary through regularly scheduled meetings, via the website, or upon request.
Instructions	The EBT Project Office will provide instructions to the counties to help them prepare for EBT and to implement EBT. Instructions may be in the form of guides, manuals, training materials, county information letters, regulations, etc.
Issues	The EBT Project Office uses a formal issue tracking and management process. Issues and their resolution will be communicated to stakeholders as appropriate.
Plans	The EBT Project Office and Citicorp EFS will produce a variety of documents which will document the project's scope, roles and responsibilities, settlement and reconciliation plans, capacity plans, system test plans, evaluation plans and so forth.

MESSAGE TYPE	DESCRIPTION
Reports (general)	As a result of various work efforts, the Project may from time to time publish reports that address specific project issues or activities. For example, at the conclusion of the pilot evaluation, the project will publish an Evaluation Report.
Resources	The EBT Project Office will provide detailed resources through all phases of the EBT implementation. Resources may be presented in various forms: user guides, work plans, detailed specific training sessions, and onsite county-specific assistance and oversight.
Status Reports	The EBT Project Office will complete monthly status reports for submission to control agencies. Project status reports will be communicated to the EBT Committee monthly and other stakeholders as appropriate. Citicorp EFS will provide weekly and monthly status reports to the Project Director as required by the contract. Counties will be responsible for providing status reports to the Regional Implementation Team during the implementation phase.

5.2 Communication Media

The communication media is the means or channels for delivering messages to the target audiences. Not all channels or methods are appropriate for all audiences, and depending upon the length or format of the message, some channels are not effective or viable. The communication media identified as appropriate for the EBT Project are described in the following table.

Table 6: Communication Media

Communication Media	Description
County Visits	County visits will be conducted by the state Implementation Team and Citicorp EFS to assist counties with EBT implementation activities including the development and testing of eligibility interfaces.
Electronic Mail (E-mail)	E-mail will be used as a means for informal, ad hoc communication between project team members and stakeholders. Outgoing e-mail will not be used as official correspondence. E-mail may be used to alert the recipient that a correspondence is forthcoming, but should not be used as a means of official correspondence itself. Official outgoing correspondence will always be in the form of a letter, memorandum or document. Appropriate uses of e-mail include scheduling meetings, forwarding documents or other information, and general questions and answers. Incoming e-mail should not be used as official correspondence; however, if the e-mail contains pertinent or historical information, the e-mail should be given a document tracking number and archived in the project document management system.
Documents	All deliverables as well as informational guides will be provided to appropriate parties in paper copy, electronic copies may also be available.
Meetings	Meetings are an important vehicle for the EBT Project to communicate to and receive feedback from external stakeholders and internal team members. Meetings may be conducted in person or via conference call. The EBT Project Team will host a number of internal and external meetings. In addition, project representatives will attend meetings hosted by other entities.

Monthly Status Reports	Project status reports will be issued monthly to the DOIT and to the EBT Committee. Project status reports include significant accomplishments, anticipated accomplishments, significant issues raised and resolved, and deliverables recently completed or upcoming.
Presentations	The Project Office identify opportunities, and respond to requests, to make formal and informal presentation at external and regional meetings. This communication plan identifies several external meetings where providing project status and other project information would be appropriate.
Training	<p>The EBT Project Office will provide training to all counties as necessary and appropriate throughout the project.</p> <ul style="list-style-type: none"> • Readiness training supports the counties in the discussion and resolution of decisions to be made that drive county implementation. • Implementation training assists the county in finalizing the identification, evaluation, selection, prioritization and documentation of EBT options, interface alternatives, conversion alternatives, space and facility alternatives and coupon conversion alternatives evaluated by counties during county readiness. <p>Citicorp EFS will provide training to state and county staff and clients during the conversion period. Training provided by Citicorp EFS will include overview training for staff, specific user training for system users, and training for clients on how to access benefits and receive customer service under EBT.</p>
Website	Publications on the EBT website are intended to share project information with the public, and will be appropriate for all project stakeholders. Pages on the site may include the project scope, charter, status, schedule, frequently asked questions, and links to related sites. All website content and links must be approved by the EBT Project Office. The website will be updated on a regular basis and updates will be made through the assigned state resources to ensure version control. The website address is www.ebtproject.ca.gov .
Work Groups	The EBT Project Office will convene work group sessions that will include subject matter, functional and technical experts. These sessions will be conducted to jointly develop business requirements, detailed design of the system, and to validate both.

6 Formal Internal Communication

Formal internal communication is required to keep the EBT Project Office staff informed of project status, work plan, issues, and risks. Internal communication also includes communication between the EBT Project Office and the HHSDC Executive Management. The following table shows the formal internal communication for the EBT Project Office.

Table 7: EBT Internal Communication

What	Audience	Frequency	Purpose	Communication Media
Project Managers Meeting	HHSDC Project Managers	Weekly	Discuss project status, risks, issues, work plans and assignments.	Oral presentation, staffs round table, question and answer.
HHSDC/CDSS Weekly Status Meeting	HHSDC and CDSS EBT team members and other CDSS stakeholders	Weekly	Discuss project status, risks, issues, work plans, upcoming events and assignments.	Oral presentation, written status, staff round table, question and answer.
HHSDC/CEFS Weekly Status Meeting	HHSDC/CDSS/CEFS team members	Weekly	Discuss project status, risks, issues, work plans, upcoming events and assignments.	Oral presentation, written status, issue & risk database, Project Workplan
Project Director/Project Sponsor meeting	Project Director and Project Sponsor	Weekly	To discuss status, risks, issues, and schedule and resolve project issues.	Oral presentations, issue database, issue papers.
HHSDC Joint Executive Staff Meeting	HHSDC Directorate, Deputy Directors, SID Project Managers.	Semi-monthly	HHSDC Director and Executive Managers share progress, issues and concerns regarding Data Center and SID projects.	Oral presentation
Project Sponsor Briefings	CDSS Executives, HHSDC Executives, CHHS Executives	As needed	Report project status, and discuss program policy issues.	Oral presentation and issue papers

7 Formal External Communication

Formal external communication is required to keep key stakeholders informed of project status, work plans, issues, and risks. The following table shows the formal external communication for the EBT Project Office.

7.1 Project Level Communication to Multiple Groups

The EBT Project will use several media to communicate to multiple stakeholders simultaneously regarding project status and general information. The objective of this communication is to provide up-to-date project background, schedules, and current activities that are easily accessible to a wide range of interested parties. The EBT Project Office is responsible for all communication described in Table 8.

Table 8: Project Level Communication to Multiple Groups

What	Audience	Frequency	Purpose	Media
EBT Committee	Various, see Section 4.9	Monthly	To provide status updates, and discuss project issues which impact multiple stakeholder groups. Agenda and minutes are sent to participants.	Oral presentations, status reports, issues
Internet website	General public	As needed	To provide general project information, schedule, progress, contacts, FAQ, resources with all stakeholders	Electronic communication

7.2 Communication with Control Agencies

There are several standard reporting mechanisms for communicating with control agencies. The EBT Project Office will submit these reports on a regular basis. Also, the EBT Project Office will provide briefings to control agencies as needed to facilitate project progress. The EBT Project Office is responsible for all communication described in Table 9.

Table 9: Communication with Control Agencies

What	Audience	Frequency	Purpose	Media
Project Status Update	DOIT	Monthly	Report project status including significant accomplishments, issues and costs. The EBT Project submits report to HHSDC Director's Office, which collects reports for all SID projects and forwards them to DOIT.	Electronic Copy
Budget Change Proposals	DOIT and DOF	Semiannual	To request funding for the current and upcoming budget year.	Document
Advance Planning Documents (APDs)	DOIT, DOF and FNS	Semiannual	To provide updates to project scope, schedule and cost	Document

What	Audience	Frequency	Purpose	Media
Briefings	DOIT, DOF, Legislature, FNS	As needed	To facilitate control agencies review and approval of key project documents and deliverables.	Oral presentations, issue papers

7.3 Communication with CWDA, Counties and SAWS Consortia

Communication with CWDA, counties and consortia will occur at multiple levels depending upon the topic and phase of the project. The methods for communication with these groups include subject matter workgroup meetings, regional training sessions, county specific meetings, consortia specific interface meetings, implementation planning bulletins and other meetings as needed.

Table 10: Communication with CWDA, Counties and SAWS Consortia

What	Audience	Frequency	Responsible Party	Purpose	Media
Work Groups	Work group members	As needed	Various county and EBT Project staff	These session are conducted to solicit information from county and State resources to develop procedures, user guides, and training materials	Workgroup meetings, oral presentations, electronic communication, hard copy documentation
Readiness Training	Counties	One-time, presented regionally	Implementation Team	To educate counties on the decisions that must be made to implement EBT and to assist them through the decision making process.	Training sessions, planning/user guides.
Implementation Training	Counties	Presented regionally by implementation waves two months prior to County Planning and Installation	Implementation Team	To assist each county in finalizing the decisions evaluated by the counties during the County Readiness Phase.	Training sessions, planning/user guides
General Project Information	Counties and CWDA	Quarterly	Implementation Team	To provide counties and other stakeholders with various types of project information and updates.	Newsletter, Letters

What	Audience	Frequency	Responsible Party	Purpose	Media
CDSS Information Letters	Counties and CWDA	As needed	CDSS Program Integrity Branch	EBT-related Program, Fiscal or EBT Policy, State Regulations	Document (ACL, ACIN, State Regulations)

7.4 Communication with Client Advocates, Community Organizations

Communication with client advocacy groups and community-based organizations (CBOs) will occur at two levels, depending upon the topic and the phase of the project. The Project Office has worked extensively with a Client Advocate Advisory Group during the ITP development and procurement process. This group was comprised of a small number of advocates from organizations throughout the state. The purpose of this advisory group is to allow interactive discussion and whenever possible mutually beneficial resolution of state-level policy issues that will impact clients using the EBT system. Communication at this level will be ongoing during design, development and implementation.

Another communication medium for this group of stakeholders is the Client Advocate Forum. The Advocate Forum was established to expand the participation in EBT development and implementation to a broader range of interested parties, and is different in purpose from the Client Advocates Advisory Group. The Forum is intended to be a medium whereby the State can educate a broad range of advocates about EBT in general, and communicate state-level EBT decisions and implementation plans. The goal is for participants, in turn, to identify and educate others in their community that should be knowledgeable about EBT. The Advocate Forum will also help the Project Office to identify outreach strategies and tools that may facilitate the transition to EBT for recipients.

County Responsibility—County welfare departments may also be interested in communicating with clients, advocates and community organizations at the local level beginning several months before EBT is scheduled for implementation in that county. Ensuring that clients and advocates understand the proposed EBT system and the impact that it will have on local welfare department operations will be helpful in obtaining their support at the local level. In addition to providing education to local advocates, the county may wish to consider advocates input into county EBT options, such as card issuance and training and whether to deliver cash benefits via EBT. The matrix below provides some suggested methods that the counties may include in their local communication plans.

Communication regarding state-level project decisions should be directed to the Project Office. The Project Office will provide guidance about what issues are open to local decision-making and what issues are state-level decisions. At the county's request, the Project Office will advise counties, provide written policy information, and/or attend county meetings to address concerns presented by clients and advocates.

Table 11: Communication with Client Advocates, Community Organizations

What	Audience	Frequency	Responsible Party	Purpose	Media
Client Advocates Advisory Group	Select group of client advocates from around the state	As needed	EBT Project Office	To receive input from advocate groups about the State's EBT system requirements and implementation plans.	Meetings, presentations
Client Advocate Forum	Various advocacy groups from around the state.	Quarterly	EBT Project Office	To provide a forum for dialog between the Project Office and a variety of advocacy groups. To provide information and education to advocacy groups so that they are able to explain and support the EBT Project in their local community.	Meetings, presentations,
County meetings	Local clients, advocates and CBOs	As needed	County welfare department	As determined by the county welfare department. May include education about EBT and/or dialog about the county's implementation decisions.	Meetings, presentations,
CBO Training	County level CBOs	During county implementation	Citicorp EFS	To provide an overview and general understanding of EBT to organizations that serve the same population that will be using EBT so that they can respond appropriately to inquiries.	Training

7.5 Communication with Retail and Banking Organizations

Communication with retail and banking organizations will be a primary responsibility of Citicorp EFS for recruitment, training and installation, and certification of interfaces and equipment. However, the Project Office will maintain communication lines for discussion of project issues and resolution of problems.

County Responsibility—Communication with local retailers and banks is not a primary responsibility of the county in EBT; however, it is inevitable that the county will have some contact and involvement with its local merchants. For example, the county may be able to identify local retailers that serve EBT clients, which may be difficult for Citicorp EFS to reach through traditional communication channels. For example, ethnic grocers, Self Help and resource Exchange (SHARE) providers, route vendors, and group homes, may be more difficult for Citicorp EFS to identify or reach. Counties may occasionally be the first point of contact of local merchants with questions, concerns or complaints about

the EBT system. Such communication should be redirected to the EBT Project Office, as such issues cannot be addressed at the county level.

Counties may also be involved in reaching out to the local banking community to encourage banks' participation as cash access providers, and participation in direct deposit with low-cost bank accounts.

Table 12: Communication with Retail and Banking Organizations

What	Audience	Frequency	Responsible Party	Purpose	Media
Retail Organizations Advisory Group	Grocers and other retailers	Quarterly	EBT Project Office	To receive input from retail groups about the State's EBT system requirements and implementation plans.	Meetings, presentations
Farmers' Markets Advisory Group	Farmers' Market associations and market managers	Quarterly	EBT Project Office	To inform farmers' market managers and organizations about the upcoming EBT implementation and its potential impact on farmers' markets. To explore possible solutions for farmers' markets and make recommendations to Citicorp EFS.	Work group meetings.
Information letters	FNS authorized vendors	Implementation Phase	Citicorp EFS	Citicorp EFS will contact all FNS authorized merchants with information letters about EBT, and will follow up with equipment and training for those who choose to participate	Letters
Local meetings	FNS authorized merchants with special needs	Implementation Phase	Citicorp EFS and Counties	To provide additional information to non-traditional merchants such as group homes, route vendors, etc., in a group setting in which Citicorp EFS and counties can answer EBT questions.	Meetings

8 Other Communication

8.1 News and Print Media

Project staff is not allowed to communicate with the media unless prior approval or direction has been granted from the HHSDC Director's Office. If a news or print media requests an interview or information, the Project Director will immediately contact the HHSDC Public Information Officer (PIO) and the CDSS Project Sponsor, who will contact the CDSS PIO. The Director's Office will request direction from the California

Health and Human Services Agency (CHHS). CHHS will direct who will be responsible for responding to the inquiry.

County Responsibility—From time to time, the counties will also receive inquiries from various media sources, which they should address according to their standard department protocol. As a courtesy, the county should contact the Project Office to inform them of the media activity.

8.2 Public Inquiries and Public Records Requests

Occasionally, the Project may receive requests from the public for information (e.g., statistics, reports, program information). If the Project receives any of these requests, the requestor will be directed to the EBT Project Director, who will refer the individual to the appropriate agency or department.

Public records maintained by the EBT Project will be available for inspection by members of the public during the regular business hours of the project. Requests for inspection or copying of public records should be directed to the Administrative Manager, and should be specific, focused and not interfere with the ordinary business operations of the project. The operational functions of the project will not be suspended to permit inspection of records during periods in which project personnel in the performance of their duties reasonably require such records. If the request requires review of numerous records, a mutually agreeable time should be established for the inspection of the records.

A public records request should be made in writing, unless the request involves records that are maintained by the project for the purpose of immediate public inspection, and should sufficiently describe records so that project personnel can identify, locate, and retrieve the records.

The EBT Project Office may refuse to disclose any records that are exempt from disclosure under the Public Records Act. (See e.g. Gov. Code Section 6254.)

Physical inspection of the records shall be permitted within the project's offices and under the conditions determined by the department. Upon either the completion of the inspection or the oral request of project personnel, the person conducting the inspection shall relinquish physical possession of the records. Persons inspecting project records shall not destroy, mutilate, deface, alter, or remove any such records from the project. The project reserves the right to have project personnel present during the inspection of records in order to prevent the loss or destruction of records.

Upon any request for a copy of records, other than records the project has determined to be exempt from disclosure under the Public Records Act, project personnel shall provide copies of the records to any person upon payment of a fee covering costs of duplication.

For more information about public records requests, see the EBT Project Policy and Procedures for Public Records Request.